

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, *et al.*

Plaintiffs,

v.

GOVERNMENT OF THE UNITED  
STATES VIRGIN ISLANDS, *et al.*

Defendants.

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Case Number: 1:23-cv-10301-AS

**STIPULATION AND PROTECTIVE ORDER  
CONCERNING PLAINTIFFS' IDENTITIES**

WHEREAS, Plaintiffs “Jane Doe 1,” “Jane Doe 2,” “Jane Doe 3,” “Jane Doe 4,” “Jane Doe 5,” and “Jane Doe 6” (collectively, the “Doe Plaintiffs”) filed this action and received leave from the Court to proceed under pseudonyms; and

WHEREAS, the Court has directed the Parties to proceed with discovery while Defendants’ Motions to Dismiss remain pending; and

WHEREAS, Plaintiffs’ counsel has agreed to “confidentially disclose” the Doe Plaintiffs’ names to counsel for Defendants (Dkt. 3-1 at p. 8); and

WHEREAS, Defendants’ counsel have agreed to maintain confidentiality of the Doe Plaintiffs’ names consistent with this Order.

NOW, THEREFORE, THE PARTIES BY COUNSEL HEREBY STIPULATE AND AGREE, and request the Court to ORDER, as follows:

1. Upon entry of this Protective Order, the Doe Plaintiffs, through their counsel, will provide their identity to the undersigned defense counsel.
2. The following persons may receive notice of the Doe Plaintiffs’ identities:

- a. Defendants
- b. Counsel for Defendants
- c. Employees or agents of counsel for Defendants who have a need to know the Doe Plaintiffs' identities in the performance of their duties related to this action;
- d. Potential witnesses for this action, including expert witnesses, provided that such persons agree to and sign the attached undertaking (Non-Disclosure Agreement). Counsel for Defendants shall maintain copies of all signed undertakings.

3. Any person who learns of the Doe Plaintiffs' identities pursuant to this Protective Order shall use that information only for purposes of this litigation and shall not disclose the Doe Plaintiffs' identities to anyone except persons identified in paragraph 2, absent Court Order.

4. Submission of this Order does not waive and shall not be construed as waiving any objections or defenses, including jurisdictional defenses, any Defendant has raised or will raise in this action. Nor does it waive a party's ability to later contend that one or more Doe Plaintiffs should no longer be permitted to proceed anonymously.

**SO STIPULATED AND AGREED.**

Dated: November 14, 2024

Merson Law, PLLC 950 Third Avenue, 18 <sup>th</sup> Floor New York, New York 10022 Tel : (212) 603-09100 Email : <a href="mailto:jplotkin@mersonlaw.com">jplotkin@mersonlaw.com</a>  /s/ <u>Jennifer C Plotkin</u>  <i>Counsel for Plaintiffs</i>	<b>IAN CLEMENT</b> <b>DEPUTY ATTORNEY GENERAL</b>  By: <u>/s/ Ian Clement</u> Ian S.A. Clement Deputy Attorney General Virgin Islands Department of Justice Office of the Attorney General 3438 Kronprindsens Gade GERS Complex, 2 <sup>nd</sup> Floor
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	<p><u>/s/ Daniel L. Cevallos</u>  Daniel L. Cevallos, Esq.  Cevallos &amp; Wong LLP  61 Broadway, Suite 2220  New York, NY 10006  <a href="mailto:Danny@DannyCevallos.com">Danny@DannyCevallos.com</a>  917.699.5008</p> <p><i>Attorneys for Defendant Gov. John de Jongh  Jr.</i></p>
	<p><b>DUANE MORRIS, LLP</b></p> <p><u>/s/ Eric R. Breslin</u>  Eric R. Breslin  Melissa S. Geller  1540 Broadway  New York, NY 10036-4086  (212) 212-692-1000  <a href="mailto:erbreslin@duanemorris.com">erbreslin@duanemorris.com</a>  <a href="mailto:msgeller@duanemorris.com">msgeller@duanemorris.com</a></p> <p><i>Attorneys for Congresswoman Stacey Plaskett</i></p>
	<p><u>/s/</u>  Amelia J. Schmidt (NYS Bar 4947131)  (admitted <i>pro hac vice</i>)  Matt Kaiser (admitted <i>pro hac vice</i>)  Courtney R. Forrest (admitted <i>pro hac vice</i>)  Kaiser PLLC  1099 14th Street NW, 8th Floor West</p>

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**SO ORDERED.**

Dated: November 15, 2024  
New York, New York

  
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ARUN SUBRAMANIAN, U.S.D.J.

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**NON-DISCLOSURE AGREEMENT**

I, \_\_\_\_\_, acknowledge that I have read and understand the “Protective Order Concerning Plaintiffs’ Identities” in this action dated \_\_\_\_\_, 2024. I agree to comply with and to be bound by all the terms of this Protective Order and I understand and acknowledge that failure to so comply could expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will not disclose in any manner any information or item that is subject to this Protective Order to any person or entity except in strict compliance with the provisions of this Order. By acknowledging these obligations under the Protective Order, I understand that I am submitting myself to the jurisdiction of the United States District Court for the Southern District of New York for the purpose of any issue or dispute arising hereunder and that my willful violation of any term of the Protective Order could subject me to punishment for contempt of Court.

Dated: \_\_\_\_\_

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